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DENIZ BOLBOL, JOSEPH CUVIELLO
7 and ALFREDO KUBA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION
11

12 DENIZ BOLBOL, an individual; JOSEPH
13 CUVIELLO, an individual; and ALFREDO
KUBA, an individual,

14 Plaintiffs,

15 v.

16 THE CITY OF SAN JOSE, AND HP
17 PAVILION MANAGEMENT,

18 Defendants.
19

Case No. C 04-0082 JW

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
FILING OF MOTION FOR
ATTORNEY'S FEES**

Hearing Date: TBD
Time: 9:00 a.m.
Courtroom: 8, 4th Floor
The Hon. James Ware

20
21 WHEREAS, on August 30, 2006, the Court issued an Order Regarding Pretrial Motions
22 and also issued a Judgment and Permanent Injunction (collectively, "Orders and Judgment");

23 WHEREAS, the Orders and Judgment provide that Plaintiffs may recover reasonable
24 attorneys fees incurred in this matter;

25 WHEREAS, Civil Local Rule 54-6 requires that the parties meet and confer for the
26 purpose of resolving all disputed issues relating to attorney's fees before making a motion for
27 attorneys fees;
28

1 WHEREAS, additional time is necessary to enable the parties to meet and confer
2 regarding any disputed issues relating to plaintiffs' attorneys fees before making a motion for an
3 award of attorney's fees, as required by Civil Local Rule 54-6;

4 WHEREAS, additional time may allow the parties to resolve any disputed issues relating
5 to attorney's fees, thus obviating the need and expense of a motion for an award of attorney's
6 fees;

7 The parties, pursuant to a stipulation, hereby respectfully request that the deadline for a
8 motion by plaintiffs for attorney's fees be extended by ninety days, to and including December
9 12, 2006.

10 Dated: September 11, 2006

GONZALEZ & LEIGH, LLP

11
12 By: /s/

13 G. Whitney Leigh

14 Attorneys for Plaintiff
15 DENIZ BOLBOL, JOSEPH CUVIELLO and
ALFREDO KUBA

16 Dated: September 11, 2006

17 BERLINER & COHEN

18
19 By: [Signature]

20 Frank R. Ubhaus

21 Attorneys for Defendant
22 SAN JOSE ARENA MANAGEMENT
23 COMPANY, LLC

24 **ORDER**

25 **IT IS SO ORDERED.**

26 Dated: 9/12/06

27 [Signature]
28 The Honorable James Ware
United States District Court Judge

Stipulation and [Proposed] Order Extending
Time for Filing of Motion for Attorney's Fees